

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 19-10345-DPW
)	
DANA A. PULLMAN and)	
ANNE M. LYNCH)	

DISMISSAL OF
COUNTS TWO AND THREE OF THE FIRST SUPERSEDING INDICTMENT

Pursuant to Fed. R. Crim. P. 48(a), the United States Attorney for the District of Massachusetts hereby dismisses Counts Two and Three of the First Superseding Indictment charging DANA PULLMAN and ANNE M. LYNCH with racketeering in violation of 18 U.S.C. § 1962(c), and wire fraud conspiracy in violation of 18 U.S.C. § 1349. In support of this dismissal, the government states that Count One of the Superseding Indictment charges the defendants with racketeering conspiracy in violation of 18 U.S.C. § 1962(d), and the defendants are charged substantively with the following crimes which also constitute racketeering acts: wire fraud, in violation of 18 U.S.C. § 1343 (Counts Four through Seven) and obstruction of justice, in violation of 18 U.S.C. § 1503(a) (Counts Ten and Eleven). The government further notes that, even with the dismissal of Count Three, each Defendant remains charged with several counts of substantive wire fraud. Dismissal of Counts Two and Three would serve the Court's stated goals of simplifying the jury instructions and verdict form, without narrowing the government's evidence or affecting potential sentencing calculations. Accordingly, dismissal is in the interests of justice.

Respectfully submitted,

RACHAEL S. ROLLINS
United States Attorney

October 25, 2022

By: /s/ William F. Abely
WILLIAM F. ABELY
AMANDA P.M. STRACHAN
Chiefs, Criminal Division

/s/Kristina E. Barclay
KRISTINA E. BARCLAY
NEIL J. GALLAGHER, JR.
Assistant U.S. Attorneys

Leave to File Granted:

DOUGLAS P. WOODLOCK
United States District Court Judge